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December 30, 2021

Via Email and ECF

The Honorable J. Paul Oetken  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Michael Valdez, et al.*, 19-cr-883-JPO

Dear Judge Oetken:

I represent Defendant Melissa Concepcion in the above-referenced case. I write on Ms. Concepcion's behalf to request a four-week extension of all outstanding deadlines and a corresponding adjournment of the sentencing hearing.

Ms. Concepcion, who resides at MDC Brooklyn, recently tested positive for COVID-19 and is symptomatic. As a result of Ms. Concepcion's diagnosis and related developments, it is unclear when it will be possible to conduct a presentence interview. The United States Probation Officer responsible for the interview has advised that the Probation Office has suspended in-person interviews at MDC Brooklyn for at least the next two weeks.

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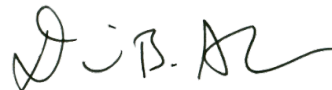
The Honorable J. Paul Oetken  
December 30, 2021  
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Ms. Concepcion has requested an in-person interview but, even if a virtual interview is arranged, it is unclear whether prison staff could safely remove Ms. Concepcion from quarantine to participate. Additionally, I am presently unable to meet with Ms. Concepcion, as MDC Brooklyn recently suspended legal visits. Given the considerable uncertainty regarding our ability to prepare for and safely conduct a presentence interview, we respectfully request extensions and an adjournment as follows:

- Completion of Ms. Concepcion's presentence interview by February 4, 2022 (originally January 7, 2022);
- Ms. Concepcion's sentencing submission due on March 25, 2022 (originally February 25, 2022);
- The government's sentencing submission due on April 1, 2022 (originally March 4, 2022); and
- Adjournment of the sentencing hearing to April 8, 2022 (originally March 11, 2022), or another date thereafter convenient for the Court.

This is Ms. Concepcion's third request for an extension or adjournment, and her first since I was appointed as counsel. The Court granted both previous requests. We have conferred with the government, which consents to this request.

Respectfully submitted,



David B. Anders

cc: AUSA David J. Robles (*via ECF*)

Granted. The schedule proposed herein is approved. Sentencing is hereby adjourned to April 8, 2022, at 2:30pm in Courtroom 706 of 40 Foley Square.  
So ordered:  
1/5/2022



J. PAUL OETKEN  
United States District Judge